

## Consumer Privacy Notice (GDPR Compliant)

### Introduction

We are committed to safeguarding the privacy of our consumers, website and service users.

This policy applies where we are acting as a **Data Controller** with respect to the personal data of our consumers, service and website users; in other words, where we determine the purposes and means of the processing of that Personal Data.

### Scope

This policy applies to the following businesses

*Total Support Training Ltd*

*Total Support Glass & Glazing Limited*

*Total Support Vocational Academy Limited*

*(hereinafter referred to as **TST**)*

Based at

1<sup>st</sup> Floor, Eagle Court, 9 Vine Street, Uxbridge, UB8 1QE; and,

11 Canons Road, Wolverton, Milton Keynes, MK12, 5TL

Please read this Privacy Notice carefully to understand our policies and practices regarding your personal data and how we will treat it.

This Notice applies to individuals who interact with **TST** as consumers.

This Notice explains how your Personal Data are collected, used, stored and disclosed by **TST**.

[Personal Data means any information that can be used to identify directly or indirectly a specific individual]

It also tells you how you can access and update your Personal Data and your own rights about how your Personal Data are used.

This Notice covers both our online and offline data collection activities, including Personal Data that we collect through various channels such as websites, apps, offline forms, third party social networks, points of sale and events.

You are not required to provide **TST** the Personal Data that we request, but if you choose not to do so, we may not be able to provide you with our products or services, or with a high quality of service or respond to any queries you may have.

This Notice provides important information in the following areas:

- 1 Sources of Personal Data
- 2 Personal Data that we collect about you and how we collect it
- 3 Special categories of Personal Data
- 4 Personal Data of Children
- 5 Cookies/similar technologies, log files and web beacons
- 6 Uses made of your Personal Data
- 7 Disclosure of your Personal Data
- 8 Retention of your Personal Data
- 9 Storage, security and/or transfer, sharing of your Personal Data
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## 1. Sources of Personal Data

This Notice applies to Personal Data that we collect from or about you, through the methods described below, from the following sources:

**TST Websites:** Consumer-directed websites operated by or for **TST** including sites that we operate under our own domains/URLs and mini-sites that we run on third party social networks, such as Facebook/Twitter etc.

**TST Mobile sites/apps:** Consumer-directed mobile sites or applications operated by or for **TST** such as smartphone apps.

**E-mail, text and other electronic messages:** Interactions with electronic communications between you and **TST**

**Offline Registration Forms:** Printed or digital registration and similar forms that we collect via, for example, postal mail, on-site demos/meetings, promotions or events with **TST**

**Advertising Interactions:** Interactions with our advertisements (e.g., if you interact with one of our ads on a third-party website, we may receive information about that transaction.

**Data we create:** In the course of our interactions with you, we may create Personal Data about you (e.g. records of your purchases from our company/websites)

**Data from other sources:** Third party social networks (e.g. such as Facebook, Google), market research (if feedback is not provided on an anonymous basis), **TST** promotional partners, public sources, professional bodies and data we receive if we acquire other companies.

## 2. Personal Data that we collect about you and how we collect it

Depending on how you interact with **TST** (online, offline, over the phone etc.), we collect various types of information from you as described below:

**Personal contact information:** This includes any information you provide to us that would allow us to contact you, such as your name, postal address, e-mail address, social network details or phone number.

**Account login information:** Any information that is required to give you access to your specific account profile. Examples could include your login ID/Email address, screen name, password in unrecoverable form, and/or security question and answer.

**Demographic information & interests:** Any information that describes your demographic or behavioural characteristics. Examples could include your date of birth, age or age range, gender, geographic location, favourite products, hobbies and interests or lifestyle information.

**Information from computer/mobile device:** Any information about the computer system or other technological device that you use to access one of our websites or apps, such as the Internet protocol (IP) address used to connect your computer or device to the Internet, operating system type, and web browser type & version. If you access a **TST** website or app via a mobile device such as a smartphone, the collected information will also include, where permitted, your phone's unique device ID, advertising ID, geo-location, and other similar mobile device data.

**Market research & consumer feedback:** Any information that you voluntarily share with us about your experience of using our products and services

**Consumer-generated content:** Any content that you create and then share with us on third party social networks or by uploading it on one of our Websites or apps, including the use of third party social networks such as Facebook. Examples include photos, videos, personal stories, or other similar media or content. Where permitted, we collect and publish consumer-generated content in connection with a variety of activities, including promotions, website community features, consumer engagement, and third party social networking.

**Third party social network information:** Any information that you share publicly on a third party social network or information that is part of your profile on a third party social network (such as Facebook) and that you allow the third party social network to share with us, examples include your basic account information (e.g. name, email address, gender, birthday, profile picture, user ID, list of friends etc) and any other additional information or activities that you permit the third party social network to share. We receive your third-party social network profile information (or parts of it) every time you download or interact with a **TST** web application on a third-party social network such as Facebook, every time you use a social networking feature that is integrated with a **TST** site or every time you interact with us through a third party social network. To learn more about how your information from a third-party social network is obtained by **TST** or to opt-out of sharing such social network information, please visit the website of the relevant third-party social network.

**Payment and Financial Information:** Any information that we need in order to fulfil an order, or that you use to make a purchase, such as your debit or credit card details (cardholder name, card number, expiration date etc.) or other forms of payment (if such are available). In any case, we or our payment processing provider(s) handle payment and financial information in a manner which is fully compliant with all applicable laws, regulations and security standards.

### 3. Special categories of Personal Data

We do not seek to collect or otherwise process sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to process your sensitive personal data for any reason, we rely on your prior express consent for any processing which is voluntary (e.g. for marketing purposes or diversity monitoring). If we process your sensitive personal data for other purposes, we rely on the following legal bases: (1) detection and prevention of crime (including the prevention of fraud); and (2) compliance with applicable law (e.g. to comply with our diversity reporting).

### 4. Personal Data of Children

We do not knowingly solicit or collect personal data from children below the age of 14. If we discover that we have unintentionally collected personal data from a child below 14, we will remove that child's personal data from our records promptly.

### 5. Cookies/similar technologies, log files and web beacons

**Cookies/Similar Technologies.** Please see our [Cookie Notice](#) to learn how you can manage your cookie settings and for detailed information on the cookies we use and the purposes for which we use them.

**Log Files.** We collect information in the form of log files that record website activity and gather statistics about your browsing habits. These entries are generated automatically, and help us to troubleshoot errors, improve performance and maintain the security of our Websites.

**Web Beacons.** Web beacons (also known as “web bugs”) are small strings of code that deliver a graphic image on a web page or in an email for the purpose of transferring data back to us. The information collected via web beacons will include information such as IP address, as well as information about how you respond to an email campaign (e.g. at what time the email was opened, which links you click on in the email, etc.). We will use web beacons on our Websites or include them in e-mails that we send to you. We use web beacon information for a variety of purposes, including but not limited to, site traffic reporting, unique visitor counts, advertising, email auditing and reporting, and personalisation.

### 6. Uses made of your Personal Data

The following paragraphs describe the various purposes for which we collect and use your Personal Data, and the different types of Personal Data that are collected for each purpose. Please note that not all of the uses below will be relevant to every individual.

<b><i>What We use your Personal Data for</i></b>	<b><i>Our reasons</i></b>	<b><i>Our legitimate interests</i></b>
<b><i>Consumer service.</i></b> We use your Personal Data for consumer service purposes, including responding to your enquiries. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. order status, technical issue, product question/complaint, general question, etc.).	Fulfilling contractual obligations Legal obligations Our legitimate interests	Improving and developing new products and services  Being more efficient
<b><i>Marketing and other promotions.</i></b> With your consent (where required), we use your Personal Data to provide you with information about goods or services (e.g. marketing communications or campaigns or promotions). This can be done via means such as email, adverts, SMS, phone calls and postal mailings to the extent permitted by applicable laws. Some of our campaigns and promotions are run on third party websites and/or social networks.	With your consent (where required) Fulfilling contractual obligations Our legitimate interests	Working out which of our products and services may interest you and telling you about them

<p>This use of your Personal Data is voluntary, which means that you can oppose (or withdraw your consent in certain countries) to the processing of your Personal Data for this purposes. For detailed information on how to modify your preferences about marketing communication, please see Section 13 below.</p>		<p>Defining types of consumers for new products or services</p>
<p><b>Third party social networks:</b> We use your Personal Data when you interact with third party social networking features, such as “Like” functions, to serve you with advertisements and engage with you on third party social networks. You can learn more about how these features work, the profile data that we obtain about you, and find out how to opt out by reviewing the privacy notices of the relevant third party social networks.</p> <p><b>Personalisation (offline and online).</b> With your consent (where required), we use your Personal Data (i) to analyse your preferences and habits, (ii) to anticipate your needs based on our analysis of your profile, (iii) to improve and personalise your experience on our Websites and apps; (iv) to ensure that content from our Websites/apps is optimised for you and for your computer or device; (v) to provide you with targeted advertising and content, and (vi) to allow you to participate in interactive features, when you choose to do so. [For example, we remember your login ID/email address or screen name so that you can quickly login the next time you visit our site or so that you can easily retrieve the items you previously placed in your shopping cart.] Based on this type of information, and with your consent (where required), The use of your Personal Data is voluntary, which means that you can oppose the processing of your Personal Data for this purpose. For detailed information on how to opt-out please refer to Section 13 below.</p>	<p>With your consent (where required)</p> <p>Our legitimate interests</p>	<p>Working out which of our products and services may interest you and telling you about them</p> <p>Defining types of consumers for new products or services</p>
<p><b>Order/Service fulfilment.</b> We use your Personal Data to process and deliver/ship your orders, [or to provide you with the service you have requested from us] inform you about the status of your orders, correct addresses and conduct identity verification and other fraud detection activities. This involves the use of certain Personal Data and payment information.</p> <p><b>Other general purposes (e.g. internal or market research, analytic, security).</b> In accordance with applicable laws, we use your Personal Data for other general business purposes, such as maintaining your account, conducting internal or market research and measuring the effectiveness of advertising campaigns. We reserve the right, if you have an account[s], to reconcile those accounts into one single account. We also use your Personal Data for management and operation of our communications, IT and security systems.</p>	<p>Fulfilling contractual obligations</p> <p>With your consent (where required)</p> <p>Legal obligations</p> <p>Our legitimate interests</p>	<p>Improving and developing new products and services</p> <p>Being more efficient</p> <p>Protect our systems, networks and staff</p> <p>Compliance with legal obligations</p>
<p><b>Legal reasons or merger/acquisition.</b> In the event that TST or its assets are acquired by, or merged with, another company (including through bankruptcy), we will share your Personal Data with any of our legal successors. We will also disclose your Personal Data to third parties (i) when required by applicable law; (ii) in response to legal proceedings; (iii) in response to a request from a competent law enforcement agency; (iv) to protect our rights, privacy, safety or property, or the public; or (v) to enforce the terms of any agreement or the terms of our Website.</p>	<p>Legal obligations</p> <p>Our legitimate interests</p>	<p>Compliance with legal obligations</p> <p>Protect our assets and staff</p>



## 7. Disclosure of your Personal Data

In addition to the TST entities mentioned in the data controllers and contact section (see Section 13), We share your Personal Data with the following types of third party organisations:

**Service providers.** These are external companies that we use to help us run our business (e.g. order fulfilment, payment processing, fraud detection and identity verification, website operation, market research companies, support services, promotions, website development, data analysis, CRC, etc.). Service providers, and their selected staff, are only allowed to access and use your Personal Data on our behalf for the specific tasks that they have been requested to carry out, based on our instructions, and are required to



keep your Personal Data confidential and secure. Where required by applicable law, you can obtain a list of the providers processing your Personal Data (please refer to Section 13 for further information).

Credit reporting agencies/debt collectors. To the extent permitted by applicable law, credit reporting agencies and debt collectors are external companies that we use to help us to verify your creditworthiness (in particular for orders with invoice) or to collect outstanding invoices.

Third party companies using Personal Data for their own marketing purposes. Except in situations where you have given your consent, we do not license or sell your Personal Data to third party companies for their own marketing purposes. Their identity will be disclosed at the time your consent is sought.

Third party recipients using Personal Data for legal reasons or due to merger/acquisition. We will disclose your Personal Data to third parties for legal reasons or in the context of an acquisition or a merger (see Section 6 for details).

## 8. Retention of your Personal Data

**TST** takes every reasonable step to ensure that your Personal Data are only processed for the minimum period necessary for the purposes set out in this Privacy Notice. The criteria for determining the retention period for your Personal Data are:

- a) **TST** will retain copies of your Personal Data in a form that allows for identification only for as long as:
  - i. We maintain an ongoing relationship with you (e.g. where you are included in our mailing list and have not unsubscribed);
  - ii. Your Personal Data are necessary in connection with the purposes set out in this Privacy Notice and we have a valid legal basis,
- b) The duration of:
  - i. any applicable limitation period (i.e. any period during which a person could bring a legal claim against us), and
  - ii. an additional 2 months following the end of the applicable limitation period (so we are able to identify any personal data of a person who may bring a claim at the end of the applicable period),
- c) In addition, if any relevant legal claims are brought, we may continue to process your Personal Data for such additional time necessary in connection with that claim.

During the periods noted in paragraphs b (i) and b (ii) above, we will restrict our processing of your Personal Data to storage or, and maintaining the security of, those data, except to the extent the data need to be reviewed in connection with any claim, or any obligation under applicable law.

Once the periods in paragraphs (a), (b) and (c) above, each to the extent applicable, have concluded, we will either

- permanently delete or destroy the relevant Personal Data or
- anonymise the relevant Personal Data.

## 9. Storage, security and/or transfer of your personal data

We use appropriate measures (described below) to keep your Personal Data confidential and secure. Please note, however, that these protections do not apply to information you choose to share in public areas such as third party social networks.

People who can access your Personal Data: Your Personal Data will be processed by our authorised staff or agents, on a need to know basis, depending on the specific purposes for which your Personal Data have been collected (e.g. our staff in charge of consumer care matters will have access to your consumer record).

Offline Security: Should we hold any Personal Data in paper format then we will ensure its security by keeping paperwork in locked drawers and cabinets and access will only be available to those authorised to use the data.

Measures taken in operating environments: We store your Personal Data in operating environments that use reasonable security measures to prevent unauthorised access. We follow reasonable standards to protect Personal Data. The transmission of information via the Internet can, unfortunately, never be completely secure and although we will do our very best to protect your Personal Data, we cannot guarantee the full security of the data during transmission through our Websites/apps.

Measures we expect you to take: It is important that you also play a role in keeping your Personal Data safe and secure. When signing up for an online account, please be sure to choose an account password that would be difficult for others to guess and never reveal your password to anyone else.

You are responsible for keeping this password confidential and for any use of your account. If you use a shared or public computer, never choose to have your login ID/email address or password remembered and make sure to log out of your account every time you leave the computer. You should also make use of any privacy settings or controls we provide you in our Website/app.

Transfer of your Personal Data. Because of the nature of our business, we may need to transfer your Personal Data within the **TST** group, and/or to the third parties as noted above, in connection with the purposes set out in this Privacy Notice. The storage as well as the processing of your Personal Data as described above may require that your Personal Data are ultimately transferred/transmitted to, and/or stored at, a destination outside of your country of residence.

If we have to transfer your Personal Data to countries outside the European Economic Area (“EEA”) including to countries which have different data protection standards to those which apply in the EEA. We (i) have put in place European Commission approved standard contractual clauses to protect your Personal Data (and you have a right to ask us for a copy of these clauses (by contacting us as set out below) and/or (ii) will rely on your consent (where permitted by law).

## 10. What are your rights?

Where we process your Personal Data, you have a number of rights over how the data is processed and can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. For details on how to exercise your rights please refer to Section 13 for additional information.

- The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Data and your rights. Therefore, we’re providing you with the information in this Notice.
- The right to access and rectification. You have the right to access, correct or update your Personal Data at any time. We understand the importance of this and should you want to exercise your rights, please contact us.
- The right to data portability. The personal data you have provided us with is portable. This means it can be moved, copied or transmitted electronically under certain circumstances.
- The right to be forgotten. Under certain circumstances, you have right to request that we delete your data. If you wish to delete the personal data we hold about you, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements. If the personal data we collect is no longer needed for any purposes and we are

not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.

- The right to restrict processing. Under certain circumstances, you have the right to restrict the processing of your personal data.
- The right to object. Under certain circumstances, you have the right to object to certain types of processing, including processing for direct marketing (i.e., receiving emails from us notifying you or being contacted with varying potential opportunities).
- The right to lodge a complaint with a Supervisory Authority. You have the right to lodge a complaint directly with any local Supervisory Authority about how we process your personal data. For the UK this is the Information Commissioner Office, [Please refer to Section 13 for their details].
- The right to withdraw consent. If you have given your consent to anything we do with your personal data (i.e., we rely on consent as a legal basis for processing your personal data), you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). You can withdraw your consent to the processing of your personal data at any time by contacting us with the details provided below.
- Rights related to automated decision-making. You have the right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on you.

In particular, you have the right:

- to obtain human intervention;
- to express your point of view;
- to obtain an explanation of the decision reached after an assessment; and
- to challenge such a decision.

To exercise any of the above rights please refer to Section 13 for further details.

Please note that, in certain circumstances, we will not be able to delete your Personal Data without also deleting your user account. We may be required to retain some of your Personal Data after you have requested deletion, to satisfy our legal or contractual obligations. We may also be permitted by applicable laws to retain some of your Personal Data to satisfy our business needs.

We hope that we can satisfy queries you may have about the way we process your Personal Data. However, if you have unresolved concerns or complaints you also have the right to complain to competent data protection authorities.

Further details on this can be found in Section 13

## 11. Automated Decision Making

**TST** do not use only automated processing with any data collected.

## 12. Changes to this Consumer Privacy Notice

If we change the way we use or handle your Personal Data, we will update this Notice. We reserve the right to make changes to our practices and this Notice at any time, please check back frequently to see any updates or changes to our Notice. [We will advise of 'last updated' date at the top of the Notice]



### 13. Data Controller(s) , Data Protection Officer(s) & Contact

To ask questions or make comments on this Notice and our privacy practices or to make a complaint about our compliance with applicable privacy laws, please contact us at:

*Total Support Training Ltd*

1<sup>st</sup> Floor, Eagle Court, 9 Vine Street, Uxbridge, UB8 1QE.

#### **Data Protection Officer:**

Samantha Alderton, Business Administration Director

Email: [samantha@totalsupport.org.uk](mailto:samantha@totalsupport.org.uk)

Mobile: 07482-724360

We will acknowledge and investigate any complaint about the way we manage Personal Data (including a complaint that we have breached your rights under applicable privacy laws) within the legal timeframes as dictated within the Regulations.

Please note: When requesting information please attach a copy of your ID or equivalent details (where requested by us and permitted by law). If the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected. Please note that any identification information provided to us will only be processed in accordance with, and to the extent permitted by applicable laws.

If you are not happy with the way in which **TST** are using, treating, processing, storing or disposing of your Personal Data you can make a formal complaint to;

The Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**E-mail:** [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Phone:** 0303 123 1113

**Web:** <https://ico.org.uk/global/contact-us/live-chat>